

To Whom It May Concern,

As a safe and concerened 25 year Truck driver and owner operator I make comment that the Werner paperless log system is not accurate in recording hours of service criteria. While I have never driven a Werner truck equipped with electronic logs I have on several occasions while stuck in traffic on Southern California freeways heard Werner drivers on the CB radio brag how there time was not being recorded and how they would use that to "make up" time once the truck started averaging a highway speed. I have also heard a driver heading south from Interstate 5 tell me his log had not worked in two days and since he had prepass to "bypass" scales his compnay told him to just record on paper until he could get to a terminal and have it fixed. On another occassion I heard two driver talking to each other how easy it is to "fix" the log. These inaccurasies of the Werner system is widely known/beleived amongst drivers in the industry to be true. Now that the system is in use the first priority for the FMCSA should be to investigate if Werners paperless system is entirely fooproof before extending any exemption.

While I realize this is only hearsay evidence I do believe the comments I heard are accurate. If it is true then the system in use should be made 110% error free before any exemption is made. It is an unfair advantage to have an electronic recording device, capable of error and or malfunction when the rest of the drivers are required to provide error free and factual documetations subject to "extreme and burdensome" penalties. Penalties that Werner drivers would not be subject to because there logs are electronic.

In summary the system I believe is not in accordance with the requirements and penalties of the HOS and all allegations of such should be investigated before any more exemption is allowed. If penalties are not made to the accurateness of paperless logs and exemptions allowed, it also welcomes an unfair advantage carriers will exploit. I also believe Werner officials know and are capitalizing on that premise.

Sincerely,

Timothy G. Trotter
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